

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No.: 19-10080-NMG
)
 GREGORY COLBURN, *et al.*,)
)
 Defendants)

**JOINT MOTION TO UTILIZE JUROR QUESTIONNAIRE AND CONTINUE
DEADLINE REGARDING VOIR DIRE**

Consistent with the operative scheduling order, the parties respectfully submit this proposal regarding voir dire in connection with the jury selection process.

The government and the defendants respectfully submit this joint motion to utilize a questionnaire to assist in empaneling the jury for trial. Due to the unique nature of this case, and the wide media attention it has garnered, the parties agree that use of a written questionnaire is appropriate. Other sessions of this Court have approved the use of such a questionnaire in similar circumstances. *See, e.g., United States v. Bulger*, 99-CR-10371, Dkt. 886, 894; *United States v. Correia*, 18-CR-10364, Dkt. 193-95.

The parties are conferring regarding the substance of a limited juror questionnaire and respectfully propose to submit as much of a joint proposed questionnaire as they have been able to agree upon, along with any supplemental requests of each party, to the Court by August 16, 2021. In addition, all parties reserve the right to propose additional questions and follow-up questions during the jury selection process, and to submit individual voir dire requests should the Court deny the parties' joint proposal.

*Motion allowed but the parties shall submit their joint
proposed questionnaire by the close of business on Thurs.
Aug. 12, 2021.*

1 S/Morton, USDT 08/04/2021